



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

Ms. Ruth Cade
Marathon Petroleum Company LP
Refining Environmental Manager
539 South Main Street
Findlay, OH 45840

JUN 08 2018

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Ms. Cade,

I am writing in response to your letter dated February 28, 2018, requesting approval for use of iso-pentane as an alternative to n-pentane to quantify all C5 hydrocarbons when you measure Net Heating Value (NHV_{VG}) in flare vent gas by gas chromatograph as required under 40 CFR 63, Subpart CC – National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries. In your letter, you request this alternative for Marathon's refineries listed in Table 1.

Table 1. 40 CFR Part 63 Subpart CC Alternative Calibration Facilities – Marathon LP

Refinery	Address	State	Zip Code
Illinois Refining Division	400 S. Marathon Ave	Robinson, IL	62454
Catlettsburg Refining	11631 US Route 23	Catlettsburg, KY	41129
Louisiana Refining Division	155 Sugarcane Road	Garyville, LA	70051
Michigan Refining Division	1300 South Fort St.	Detroit, MI	48217
Ohio Refining Division	2408 Gambrinus Rd. S.W.	Canton, OH	44706
Galveston Bay Refinery	2401 5Th Ave. South	Texas City, TX	77592

In your letter, you propose to use either iso-pentane or n-pentane to quantify all C5 hydrocarbons. Your rationale for this request is harmonizing the requirement with the Marathon Flare consent decree (MPC Flare CD) for six refineries listed in *Unites States v. Marathon Petroleum Company LP and Catlettsburg Refining LLC*, No. 2:12-cv11544-DML-MJH. You provided supporting references showing that the molecular weight and heating value of iso-pentane and n-pentane are identical per the values in 40 CFR 63, Subpart CC, Appendix Table 12 and referenced in the MPC Flare CD, Appendix 1.3, Table 1.

With this letter, we are approving your request to substitute iso-pentane for n-pentane as it pertains to 40 CFR 63, Subpart CC with the additional provisos listed below:

- 1) You must meet the requirements in 40 CFR 63.671(e)(1) and (2), including the Table 13 requirements for Net Heating Value by Gas Chromatograph.
- 2) When your consent decree requires use of the response factor for iso-pentane to conform to MPC Flare CD requirements, you may quantify iso-pentane and any unknown components detected with a higher molecular weight than iso-pentane with the iso-pentane response factor.

- 3) You must meet all other applicable generic requirements of §§63.670 and 63.671 for measurement of NHV_g (i.e., measurement requirements not specifically targeted to gas chromatographs).
- 4) A copy of this approval letter must be included in the report for each testing program where these alternative testing procedures are applied.

Since this alternative test method approval under 40 CFR 63.7(f) addresses rule and permit simplification for the specific facilities with requirements under a consent decree, this alternative approval is only applicable for use at the facilities listed in Table 1 of this response to your request.

If you have any questions regarding this approval or need further assistance, please contact Ray Merrill at (919) 541-5225 or merrill.raymond@epa.gov.

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

cc.

Sean Alteri, Kentucky DEP
Julie Armitage, Illinois EPA
Beverly Banister, US EPA Region 4
Mary Ann Dolehanty, Michigan DEQ
Terri Dzienis, Canton City Health Department
Lorie FitzSimmons-Evans, Galveston County Health District
Gerri Garwood, EPA/OAQPS/SPPD
Steve Hagle, TCEQ
Bob Hodanbosi, Ohio EPA
Maria Malave, EPA/OECA/OC
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Tegan Blades Treadaway, Louisiana DEQ